

EXHIBIT A
FILED UNDER SEAL

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

_____/

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF GREGORY KINTZ

SAN FRANCISCO, CALIFORNIA

WEDNESDAY, APRIL 26, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

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JOB NO. 2592507

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1	And in that Excel file, I computed the X/Y	12:08
2	separations using the Pythagorean theorem, as	12:08
3	previously discussed.	12:09

4 Q Okay. And the use of the Pythagorean theorem 12:09
5 to calculate separation, is that what you're calling 12:09
6 vertical separation in paragraph 33? 12:09

7 A The separation is the separation between the 12:09
8 individual components. The terminology of vertical, 12:09
9 yes, that is the separation between the 12:09
10 two components. 12:09

11 Q Okay. And I -- I just want to clarify. 12:09

12 So, earlier we were looking at the X/Y 12:09

13 coordinates for the GBr3. 12:09

14 Do you recall that? 12:09

15 A Yes.

12:09

16 Q By vertical separation, you're not talking 12:09
17 about just the delta or the difference between the Y 12:09
18 coordinates between two diodes then; is that correct? 12:09

19 A No. I was computing the -- both components. 12:09

20 Q Using both the X and Y coordinates? 12:09

21 A Yes. 12:10

22 Q And then there is this number [REDACTED] [REDACTED]

12:10

24 Do you see that in paragraph 33? 12:10

25 A Yes.

12:10

1 But let me ask you my next question, which 12:13
2 is: You also looked at the difference in angular 12:13
3 orientation as well? 12:13

4 A Correct. 12:13

5 Q And that was part of your determination as to 12:13
6 whether or not there was [REDACTED] [REDACTED]
[REDACTED]; correct? 12:13

8 MR. JAFFE: Objection; form. 12:13

9 THE WITNESS: There is -- as demonstrated by 12:13
10 the information in the pick-and-place file, that there 12:13
11 [REDACTED] [REDACTED]

[REDACTED] 12:14

13 MR. KIM: Q. So you could look at the 12:14

14 [REDACTED] [REDACTED]

[REDACTED] 12:14

16 A The angle information by itself would not 12:14
17 yield enough data to actually produce that 12:14
18 information. 12:14

19 Q Why not? 12:14

20 A Because angle only tells you position along a 12:14
21 line or a vector, and not -- doesn't give you the 12:14
22 secondary intersection point that defines a point. 12:14

23 Q And so you would need to look at both the 12:14
24 difference in angular orientation, as well as the 12:14
25 difference in the X and Y coordinates; correct? 12:14

1 A That is correct. 13:42

2 Q Okay. And in order to calculate the vertical 13:42

3 spacing between A0 and A1, how would you calculate 13:42

4 that using the X/Y coordinates there? 13:42

5 A The vertical spacing is related to its 13:42

6 position on the great circle relative to the lens. 13:42

7 And so I would take the difference in the X/Y 13:42

8 components and compute their separation, the 13:42

9 Pythagorean theorem. 13:42

10 Q Is that something you could do now between A0 13:42

11 and A1? 13:42

12 A Yes. 13:42

13 Q Okay. What -- what is the vertical 13:42

14 separation between those two? 13:42

15 A Do you have a calculator? 13:42

16 0 We do.

13:42

17 A Do you have a sheet of paper that I can write 13:42

18 on? 13:42

19 Q Yes. 13:42

20 A Do you have a pen that I can write with? 13:43

21 0 Sure. 13:43

22 A (Witness complies.) 13:43

23 I come up with [REDACTED] with 13:46

24 rounding to the third significant digit. 13:46

25 Q And what does that number represent? 13:46

1 THE WITNESS: No. With the data that you've 13:55
2 given me right here at this time, with the equipment 13:56
3 that's available to me, I cannot make a determination. 13:56

4 MR. KIM: Q. And what would you need to make 13:56
5 that determination? 13:56

6 A I would need to have information that gave me 13:56
7 the locations of the features on this board. This is 13:56
8 a fabrication document that lays out the layers of the 13:56
9 board and the relative positions of the bond pads on 13:57
10 the surface of the board, but does not really disclose 13:57
11 any information on the actual positions of the 13:57
12 components. 13:57

13 Q And the same would be true for Exhibit 1043 13:57
14 that you were just looking at before that? 13:57

15 A No. 1043 actually has component information 13:57
16 on it. 13:57

17 Q Okay. And what would you need to determine 13:57
18 whether or not the [REDACTED] [REDACTED]
[REDACTED] for the board depicted in Exhibit 1043? 13:57

20 A Ideally, I would need a way of expanding the 13:57
21 image and creating center line information between the 13:58
22 placed components in their ideal location and the 13:58
23 adjacent one, and from that information, computing the 13:58
24 data. 13:58

25 I frequently do that type of analysis in 13:58

1 graphics programs. I in particular use a program 13:58
2 called CorelDRAW that allows me to do this type of 13:58
3 detailed point-by-point analysis. 13:58

4 Q And that would be for the purpose of 13:58
5 determining the X/Y coordinates and the theta? 13:58

6 A That's correct. 13:58

7 Q And you didn't do that for the board depicted 13:58
8 in Exhibit 1043; correct? 13:58

9 A That's correct. 13:58

10 Q Okay. 13:58

11 (Document marked Exhibit 1045 13:58

12 for identification.) 13:59

13 MR. KIM: I have the same question for 13:59

14 Exhibit No. 1045, which bears Bates No. Uber00008610. 13:59

15 Q Does this exhibit depict [REDACTED] [REDACTED]

[REDACTED] 13:59

17 A This document is an assembly document. So 13:59

18 the positions -- so the actual components should be 13:59

19 shown in the printout. And again, I would need to 13:59

20 expand the figure to make a determination of the 13:59

21 relative position. 13:59

22 Q So sitting here today, you can't tell me 13:59

23 whether or not the board depicted in Exhibit 1043 has 13:59

24 [REDACTED] -- 13:59

25 MR. JAFFE: 1045, I'm assuming you're asking 13:59